



**PLAN CHANGE 30 – SPECIAL PURPOSE ZONES, VARIATION 2 TO PLAN CHANGE 23,
VARIATION 3 TO PLAN CHANGE 26, AND VARIATION 3 TO PLAN CHANGE 27**

FURTHER SUBMISSION

**FORM 6
UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT
ACT 1991**

Please note all information provided in this submission will be made publicly available

Details of Further Submitter

Full Name: <i>(Required)</i>	Rayward Aviation Ltd
Contact Person: <i>(If different from above)</i>	Tim Rayward
Postal Address: <i>(optional)</i>	P.O. Box 42, Lake Tekapo 7999
Email Address: <i>(Required)</i>	timrayward@gmail.com
Telephone Number: <i>(Required)</i>	021 0767196

Further Submitter Declaration

I am:

- ☐ a person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category below.
- ☒ a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category below.

(Tick one box)

Rayward Aviation Ltd is the owner of the Lake Tekapo Airport and associated infrastructure for aviation operations including aviation research facilities.

Further Submission Details

I **oppose** the submission of:

(enter the name and address of original submitter and the original submitter number)

Director-General of Conservation (the Director-General)

Department of Conservation

Private Bag 4715, Christchurch Mail Centre, Christchurch 8140

PC30 Submission 11

The particular parts of the submission I oppose are:

(clearly indicate which parts of the submission you support or oppose, together with any relevant provisions of the proposal)

I oppose the above submitter's relief sought to:

1. Airport Activity definition PC30.13 11.02
2. Airport Special Purpose Zone Policies Provisions PC30.11 AIRPZ-P1 AIRPZ-O1.
3. Glentanner Special Purpose Zone Provisions PC30.06 GSPZ -O1, GSPZ-O2, GSPZ-P4, GSPZ-R12, GSPZ-R13

The reasons for my opposition are:

1. The airport activity definition as proposed in PC30 is adequate as is.
2. The airport definition proposed in PC30 does not include activities beyond the expected scope of airports. The submitter proposes changes that would severely limit legitimate airport activity and compromise the ongoing viability of airports which are operating in an environment of greatly increased costs. It also jeopardises the economic benefits to the Mackenzie District and New Zealand.
 - a. Aviation research is a legitimate aviation activity and has been an existing activity at airports in the basin for a considerable period of time.
 - b. Purpose built facilities (with considerable investment) exist at Lake Tekapo Airport. The economic and social (employment , career paths) benefit of aviation research opportunities are of vital significance to airports in the basin which have high operating costs.
 - c. There is a large range of possible aviation research and most could be regarded as less intrusive than more typical aviation activity. It can include a wide range of aircraft including electric, balloons, non-powered and conventionally powered aircraft, autonomous, scale models etc
 - d. Most of the larger scale aviation research projects in the area have had considerable stakeholder engagement which has included environmental considerations. There are ways to mitigate any environmental concerns

associated with research activity, if they arise, without trying to totally ban all aviation research activity.

3. The clause **d. Aviation research and testing laboratories** needs to remain as they continue to be an important part of airport operations. To remove this clause would greatly reduce NZ opportunities to attract world class aviation research and associated benefits to the region.
4. The submitters proposal to amend the use of airports to **rural, tourism and passenger activities** would be unacceptable to any airport owner or operator as it would exclude a large portion of reasonable and valid airport activity i.e. Recreational, flight training, flight testing (routine requirement after maintenance) survey, photography, gliding etc.
5. **Excluding rocket-powered vehicles** is also unreasonable, there is a large range of rocket types, operational characteristics and size. Any impacts from this sort of activity would be carefully assessed by airport operators and NZCAA and any required mitigation for specific problems would be put in place. The reference to supersonic flight by the submitter is "emotive", it is happening at an altitude where it would be barely perceptible on the ground and regulated by NZCAA. Dawn Aerospace example : The limited nature of the testing (small number of flights) , rapid climb away to extremely high altitude flight and glide return to landing means the environmental impact is significantly less than other "normal" aviation. ie low level helicopter agricultural operations would be considered more intrusive on the natural environment.
6. The submitter seeks to add the wording **and natural values** within the Policies Provisions, we would question the relevance and oppose the addition. The Policy (clause 4) refers to built development not airport/aviation activity. Furthermore the term "natural values" is extremely vague and could be interpreted in any number of ways. The ecological value of surrounding land is protected by the objectives and policies related to that particular zone. Landscape character and visual amenity are reasonable in a built development sense but not trying to include the natural values of the surrounding land.

I seek that the whole or part (describe part) of the submission be allowed or disallowed: *(give precise details)*

I seek the following as per the table below to be disallowed.

Point (as per Summary of Submissions by Submitters)	Section	Sub-Section	Provision	Position
11.02	Interpretation	Definitions	Airport Activity	Disallowed
11.04	Airport Special Purpose Zone	Objectives	AIRPZ-O1	Disallowed
11.05	Airport Special Purpose Zone	Policies	AIRPZ-P1	Disallowed

11.06	Glentanner Special Purpose Zone	Objectives, Policies and Rules	Objectives GSPZ- O1 and GSPZ-O2, Policy GSPZ-P4, and Rules GSPZ- R12 and GSPZ-R13	Disallowed
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- ☐ **I wish to be heard** in support of my further submission.
- ☒ **I do not wish to be heard** in support of my further submission. *(Tick one box)*

If others make a similar further submission I **would not** be prepared to consider presenting a joint case with them at any hearing.

Signature of further submitter or person authorised to sign on behalf of further submitter *(A signature is not required if you make your submission by electronic means.)*

Date: 24.02.2025

The closing date for lodging a further submission is **5pm Monday 24 February 2025**. Please note that a copy of your further submission must be served on the original submitter within five working days after it is served on the Mackenzie District Council.

Your submission (or part of your submission) may also be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language; or
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Once the closing date for further submissions has passed, Council hearings for the Plan Changes, Variations and Designations will be arranged to consider all submissions. Anyone who has made a submission or further submission and indicated that they wish to be heard will have the right to attend the hearings and present their submission or further submission.

If you have any questions regarding the Plan Changes, Variations and Designations or the further submission process, please do not hesitate to contact the Planning Department at 03 685 9010 or via email districtplan@mackenzie.govt.nz.